

### **REMARKS**

Reconsideration is respectfully solicited.

Claim 18 serves as the basis for Claim 23 et seq. Claim 18 [to a method] was a claim directed to elected subject matter [in the face of a restriction requirement]. Claims 23-39 contain recitations of Claims 1-17, respectively. The preamble(s) of Claims 23-39 refer(s) to a method. Claim 18 has been amended in view of the U.S. PTO statements in the Advisory Action of July 1, 2004

In applicants' view, none of the applied art [or concurrently cited art] provides the written description required to constitute an anticipatory reference. Please see section 2131 of the MANUAL OF PATENT EXAMINING PROCEDURE. Therein the MPEP encapsulates the law with respect to 'anticipation' case precedent. The unitary reference applied as an anticipation must provide written description of each and every element of the claim under scrutiny.

Applicants respectfully traverse the rejection of claims of the instant patent application over WO97/00314 [based on the description of U.S. 6228480 ], under 35 U.S.C. 102(b). The Kimura U.S. counterpart of WO97/00314 does not provide written description of each and every element of the rejected application claims. Kimura does not describe a laminate formed by heat-pressing.

The U.S. PTO Examiner's attention is respectfully directed to Examples 86-88 of '480. These Examples recite coating a metal substrate and drying; thereafter another layer is applied to the adhesive which is characterized as photocatalyst layer. This is not the method of the claims at issue in this application.

Moreover, Kimura does not describe the structural result which is embodied by the Figure of the application; the structure of the Figure in the instantly rejected application is the result of the method claims of the instant application, including Claims 18 and 23 et seq. In summary, the reference does not describe laminating in accordance with steps (a)-(c) of claim 18 or the photocatalyst-supporting film and the laminating by heat-pressing of claim 23[and the claims dependent thereon]; use of the further adhesive layer of claim 24 [and the claims dependent thereon]; the lamination of 2 or more resin films as in claim 25 [and the claims dependent thereon] or the adhesive layer of claim claims 28 [and the claims dependent thereon]. Thus, the reference fails to describe the subject matter of the claims in this application, and thus fails to anticipate the claims. Moreover, the reference fails, under 35 U.S. C. 103 to render obvious the subject matter herein. Please see the specification at page 16 line 11-16 and at page 17 lines 14-26. At page 16 it is stated,

"in the present invention, heating and pressing are employed for the laminating process, which allows .. firm sticking of the photocatalyst layer to the adhesive layer and..better durability, adherence and anti-exfoliation..."

At page 17 it is stated,

"Accordingly, the present invention has ...improvement in ...homogeneity of film thickness, which are facilitated by ...faster formation of a photocatalyst layer [compared] to the..method to coating and drying...according to common dipping method or spraying method...Further the metallic plates ...wide application..since those structures can be prepared into various shapes by molding metallic plates and resin substrates by press processing following to lamination with the photo catalyst-supporting film and subsequent cutting."

In applicants' view, none of the advantages described in the application under examination are described or suggested by the applied references. Accordingly, withdrawal of the reference rejections is respectfully solicited.

Pursuant to the Examiner's informal recommendation, a drawing change is attached hereto in which the legend "Fig. 1 " is deleted.

Reconsideration and an early allowance are respectfully solicited.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Marina V. Schneller", written over a horizontal line.

Marina V. Schneller

Registration No. 26,032

VENABLE LLP

Post Office Box 34385

Washington, D.C. 20043-9998

Telephone: (202) 344-4062

Facsimile: (202) 344-8300

